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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 (Honorable Leo S. Papas)

11 UNITED STATES OF AMERICA,)	CASE NO. 08MJ0843
)	
12)	
)	Plaintiff,
13)	NOTICE OF MOTION; MOTION FOR
)	VIDEOTAPE DEPOSITION AND
14 vs.)	SUBSEQUENT VOLUNTARY DEPORTATION
)	OF MATERIAL WITNESS; MEMORANDUM
15 MARTIN ORTIZ-CASTANEDA,)	OF POINTS AND AUTHORITIES AND
)	DECLARATION OF THOMAS G. GILMORE
16)	IN SUPPORT THEREOF
)	
)	DATE: April 15, 2008
17 Defendant.)	TIME: 9:30 am
)	PLACE: Courtroom of Magistrate
18)	Leo S. Papas

19 TO: UNITED STATES ATTORNEY; DEFENDANTS AND THEIR ATTORNEYS OF
20 RECORD:

21 PLEASE TAKE NOTICE that on April 15, 2008 at 9:30 a.m. or as
22 soon thereafter as the matter may be heard, material witnesses
23 ADOLFO GALVEZ-DE JESUS, ALBERTANO PANTALEON-NAJERA, FRANCISCO
24 RAMIREZ-VELASQUEZ and ANTONIO GALVEZ-DE JESUS, will move the Court
25 for an Order that they be subjected to a videotape deposition prior
26 to trial and subsequent voluntary deportation.

27 This motion will be based on 18 U.S.C. 3144 in that the
28 witnesses testimony can be adequately secured by deposition and

1 further detention is not necessary to prevent a failure of justice.

2 This motion is further based on this notice of motion, the
3 memorandum of points and authorities and declaration of Thomas G.
4 Gilmore filed herewith, and as such other and further evidence as
5 may be presented at the hearing of the motion.

6 Respectfully submitted,

7 DATED: 4/2/08

8 /ss/Thomas G. Gilmore
THOMAS G. GILMORE, Attorney for
Material Witnesses

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